Appendix F Input and Response to Draft SMMNRA Fire Management Plan/EIS

Commentator Summary

Table F-1 Commentator Summary Table

	Commentor Name	Comment Category	Comment Number
Government Agencies	U.S. Army Corps of Engineers	Permit required	1
	U.S. Environmental Protection Agency	Air quality Alternatives to prescribed burning Air quality analysis Alternatives analysis Mechanical alternatives Mitigation measures Alternative 6 Emissions analysis	2 3 4 5 6 7 8 **9**
	National Oceanic and Atmospheric Administration	Steelhead trout impacts ESA Section 7 consultation	10 11
	California Department of Parks and Recreation	Prescribed burning Definitions Resource Advisor Decision model Landscape era Sensitive species National Historic Register State Wilderness Area Terminology Park closures Prescribed burn benefits	12 13 14 15 16 17 18 19 20 21 22
	County of Los Angeles Fire Department	Defensible space Vegetation management Comprehensive strategy Environmental compliance Conflicts with LA County Fire Plan; Reject all alternatives Federal Fire Policy Agency collaboration	23 24 25 26 27 28 29
	County of Los Angeles Department of Parks and Recreation	No impact	No response required
	Ventura County Air Pollution Control District	Smoke management plan and permit required Mitigation measures	30 31

	Commentor Name	Comment Category	Comment Number
Groups and Organizations	California Native Plant Society	Bias	32
		Terminology	33
		Invasives, type conversion	34
		Fuel modification, erosion	35
		Figure 3-22	36
		Erosion, flood	37
		Strategic fuel modification	38
		Suppression	39
		Fuel modification	40
		Land use	41
		Prevention	42
		Ecological prescribed fire	43
		Mechanical fuel reduction	44
		Alternatives	45
		Protection of natural resources	46
	Pacific Palisades Community Council; Pacific Palisades Residents Association; Wildfire Research Network	Support preferred alternative	47
		Strategic fuel modification criteria	48
		Area of concern	49
Individuals	Stephanie Blanc	Destruction of resources	50
		Conclusions inconsistent with analysis	51
		Preferred alternative inconsistent with NPS mandate	52
		Mitigation of annual destruction of parkland	53
		Type conversion	54
		Mitigation, type conversion	55
		Roads	56
		Mechanical fuel modification	57
		Insects	58
		Bees	59
		Insects	60
		Restoration costs	61
		Arthropods	62
		T&E species	63
		Habitat connectivity	64
		Habitat fragmentation	65
		Catastrophic species loss	66
		Land use	67
		Cooperation	68
		Fuel modification standards	69
		Invasives	70
		Cooperation	71
		Reject preferred alternative ("burn it up or mechanically tear it out of your heart")	72
		NPS mandate	73

	Commentor Name	Comment Category	Comment Number
Individuals	Don Mullally	Comments not in reference to FMP	74
	Pamela Palmer	Fuel modification zone Minimize impacts	75 76
	Ronald Rindge 8/2/04	Comments directed to Los Angeles County Fire Department	77
	Ronald Rindge 8/10/04	Water storage tanks	77
	B. Sachau	Land use Prescribed fire air quality health effects	78 79
	Roland Tso	Reducing fire risk opposed Protect natural resources Another alternative needed	80 81 82
	Charlie Whitman	Safety not provided for Resource protection favored over safety Bias Scale of impacts limited Data invalid Safety and interagency cooperation not provided for NEPA, social risk Federal fire policy excluded Preferred alternative inconsistent with goals Restoration funding Cooperative relationships Risk analysis inadequate NEPA requirements inappropriate NPS mechanical fuel treatments inadequate Definitions/Strategic fuel modification Age mosaic WUI fuel reduction Defensible space/Obstacles created Firefighter safety	83 84 85 86 87 88 89 90 91 92 93 94 95 96 97 98 99 100 101
	Karen Cleaver; Mary Pelletier; Katherine Glascock; Frances Knight	NPS mandate Natural resource degradation NPS standards and recommendations DO #18 CNPS guidelines Conservation ethics GMP goals	102 103 104 105 106 107 108

	Commentor Name	Comment Category	Comment Number
Individuals	Karen Cleaver; Mary Pelletier; Katherine Glascock; Frances Knight continued	Botanical surveys	109
		Strategic fuel modification	110
		Rehabilitation funding	111
		Prescribed burning	112
		Mechanical fuel modification	113
		Ecosystem resilience	114
		Resource protection	115
		Environmental change	116
		Spiritual values vs. safety	117
		Staging areas	118
		Mechanical fuel modification – bulldozers	119
		Rehabilitation	120
		Environmental impacts	121
		Decision making process	122
		No benefits to strategic fuel modification	123
		Spring burns	124
		Adverse impacts	125
		Diminishing natural resources, reduce fuel modification	126
		Inadequate data	127
		Natural resource heritage	128
		Size fuel modification zone	129
		Target conditions	130
		Pollinators/herbicides and pesticides	131
		Restoration and monitoring	132
		Seedbank	133
		Erosion	134
		Invasive species introductions	135
		Disking	136
		Roads and trails	137
		Development inducing	138
		Exotic plant control	139
		Super-scooper helicopter	140
Additional Input	Santa Ynez Band of Mission Indians	Native American monitor	141
	Ventura County Fire Department	Land use/wildland development	142
		FMP inadequate to scale of problem	143
		Lack of balance	144
		No increase in mechanical treatment	145
		Ecological prescribed fire	146
	Los Angeles City Fire Department	Support Alternative 2	147

Input 1

DEPARTMENT OF THE ARMY
LOS ANGELES DISTRICT, CORPS OF ENGINEERS
VENTURA FIELD OFFICE
2151 ALESSANDRO DRIVE, SUITE 110
VENTURA, CALIFORNIA 93001

REPLY TO
ATTENTION OF:

September 3, 2004

Office of the Chief
Regulatory Branch

National Park Serivce Santa Monica Mountians Recreation Area
Attention: Woody Smeck
401 West Hilcrest Drive
Thousand Oaks, California 91360

Dear Mr. Smeck:

It has come to our attention that you plan dated July 15, 2004 to approve a Fire Management Plan for the Santa Monica Mountains National Recreation Area in Ventura County, California. Unfortunately, due to our current permit workload we are unable to provide detailed comments on the document at this time.

However, please be advised the proposed project may require a U.S. Army Corps of Engineers permit for any activity that may temporarily or permanently impact waters of the United States by way of fill material or construction equipment.

A Corps of Engineers permit is required for the discharge of dredged or fill material into, including any redeposit of dredged material within, "waters of the United States" and adjacent wetlands pursuant to Section 404 of the Clean Water Act of 1972. Examples include, but are not limited to,

1. creating fills for residential or commercial development, placing bank protection, temporary or permanent stockpiling of excavated material, building road crossings, backfilling for utility line crossings and constructing outfall structures, dams, levees, groins, weirs, or other structures;

2. mechanized landclearing, grading which involves filling low areas or land leveling, ditching, channelizing and other excavation activities that would have the effect of destroying or degrading waters of the United States;

3. allowing runoff or overflow from a contained land or water disposal area to re-enter a water of the United States;

4. placing pilings when such placement has or would have the effect of a discharge of fill material.

Input 1 continued

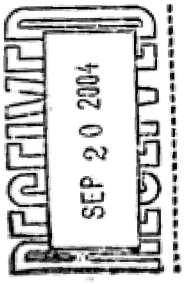
You will find a permit application form and a pamphlet that describes our regulatory program on the Corps Los Angeles District webpage at www.spl.usace.army.mil/regulatory. If you have any questions, please contact me at (805) 585-2140. Please refer to this letter and 200401788-HW in your reply.

Sincerely,

Heather Wylie
Project Manager

Input 2

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105-3901



September 13, 2004

Woody Smeck, Superintendent
Santa Monica Mountains National Recreation Area
401 West Hillcrest Drive
Thousand Oaks, CA 91360-4207

Subject: Santa Monica Mountains National Recreation Area Fire Management Plan Draft Environmental Impact Statement (DEIS) [CEQ #040268]

Dear Mr. Smeck:

The U.S. Environmental Protection Agency (EPA) has reviewed the above referenced document. Our review and comments are provided pursuant to the National Environmental Policy Act (NEPA), the Council on Environmental Quality's NEPA Implementation Regulations at 40 CFR 1500-1508, and Section 309 of the Clean Air Act.

We have rated this DEIS as EC-2 -- Environmental Concerns-Insufficient Information (see enclosed "Summary of Rating Definitions"). We agree with the National Park Service that fire management is extremely important in the Santa Monica Mountains National Recreation Area (SMMNRA), especially because of its proximity to and wildland/urban interface with densely populated areas of Los Angeles and Ventura counties. We are concerned, however, that the prescribed burn treatments included in the proposed alternative may result in more adverse air quality impacts than using only mechanical treatment to meet the same needs. We recommend that the Final Environmental Impact Statement (FEIS) analyze an alternative that would achieve ecological and strategic fuels treatment via mechanical means rather than through prescribed burning. The FEIS should also analyze air quality impacts for criteria pollutants other than PM10 (particulates smaller than ten microns). Our detailed comments are enclosed.

We appreciate the opportunity to review this DEIS and request a copy of the FEIS when it is filed with our Washington, D.C. office. If you have any questions, please call me at (415) 972-3854, or have your staff call Jeanne Geselbracht at (415) 972-3853.

Sincerely,

Lisa B. Hanf, Manager
Federal Activities Office

Printed on Recycled Paper

Input 3

UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL MARINE FISHERIES SERVICE
Southwest Region
501 West Ocean Boulevard, Suite 4200
Long Beach, California 90802- 4213

SEP 15 2004 151422SWR04PR13930:APS

Woody Smeck
National Park Service
Santa Monica Mountains Recreation Area
401 West Hillcrest Drive
Thousand Oaks, California 91360

Dear Mr. Smeck:

The National Marine Fisheries Service (NOAA Fisheries) reviewed the National Park Service's draft Environmental Impact Statement (EIS) for implementation of a fire management plan (plan) at the Santa Monica Mountains National Recreation Area. The following constitutes NOAA Fisheries views on the draft EIS.

With regard to the description of the affected environment, the life history of the endangered Southern California Evolutionarily Significant Unit of steelhead (*Oncorhynchus mykiss*) includes rearing in streams for one or more years until such a time when they are physiologically ready to enter seawater. Juvenile steelhead rear year round in Malibu Creek, Topanga Creek and Arroyo Sequit and, therefore, impacts of fires on this species would involve spawning as well as rearing life stages, including life stages that develop in the gravel prior to an "open-water" existence.

With regard to impacts of the alternatives, because steelhead rear in streams all year, siltation of rearing habitat is of concern as well as siltation of spawning habitat. While the EIS does identify some of the impacts that are expected to result from the proposed action, the EIS does not adequately address the consequences of the impacts for endangered steelhead at the individual or population level.

With regard to section 7 of the Endangered Species Act of 1973, adoption of the plan will require consultation with NOAA Fisheries. Presently, the EIS makes no mention of this requirement.

Thank you for the opportunity to review the draft EIS. Please call Anthony Spina at (562) 980-4045 if you have any questions concerning this letter or if you would like additional information.

Sincerely,

for Rodney R. McInnis
Regional Administrator

Input 4

State of California • The Resources Agency — Arnold Schwarzenegger, *Governor*

DEPARTMENT OF PARKS AND RECREATION — Ruth G. Coleman, *Director*

Fire/Trails Management Program
Angeles District
39998 Pacific Coast Highway
Malibu, California 90265
310-457-4358

September 17, 2004

Fire Management Program
Attention: Marty O'Toole FIO
SMMNRA

Subject: Comments, EIR Fire Management Plan SMMNRA

I have reviewed the Draft, Environmental Impact Statement – Fire Management Plan for the Santa Monica Mountains and wish to presents some comments regarding this plan.

The bulk of information contained in the plan was very informative and useful. I found that there were a few areas that needed consistency with current fire management terminology and areas that should have additional information included. Please review the following comments:

Page 2-6 There was no mention associated with using prescribed burning for other species other than plants. Example, Endanger species habitat enhancement

Page 2-14 I was not clear on the terms used to describe weed abatement and brush clearance. Are these two words inter-related? Would fuel reduction be more consistence with the intent for this chart?

Page 2-22 I would suggest that a Resource Advisor be assigned to the Incident Command structure, especially when potential endanger species habitat is threatened.

Page 3-39 I had difficultly trying to interpret the box "site-specific hazard mitigation instead of landscape level fuel modification", could this be defined for better clarification?

Page 3-48 second paragraph, I not sure if there were any comments about what landscape era the plan was trying to identify? Is it referring to pre-european, or pre-human? What landscape is the plan aiming for? What information can be added to promote this process?

Page 3-76 Rare, Threatened and Endangered Species: Sensitive Plants. What is the status for the Giant Coreopsis plant?

Page 3-126 potentially eligible for the National Register… please includes the Sycamore House at Pt. Mugu State Park...

Input 4 continued

Page 4-3 Within the SMMNRA we have a State Park Wilderness Area, Boney Mountain Wilderness Area, can this be mention in the draft.

Page 4-9 Mitigation Measures, Wildfire Suppression – Operational Impacts, section 2) the word center was used, to be consistent with fire terminology it should be change to **Post**.

Page 4-72 Proposed Actions, Wildfire Suppression. It would be very helpful if you would list your authority for closures. Example State Parks has a Superintendent Order to close backcountry units in state parks and during a wildfire we use California Penal Code 409.5 as our enforcement authority.

4-79 Alternative I – No-Action Alternative. Could you please also mention that the 1996 prescribed burn conducted adjacent to Las Virgenes Road by California State Parks had significant influence in the direction of the Calabasas Wildfire Incident in 1996. Post-simulator studies were conducted by Ishmael Messer, FMO for the SMMNRA that displayed that the prescribed burn did assist firefighting efforts which kept the fire from advancing toward the Malibu Lake community.

I hope that my comments are useful for the completion of the EIS Fire Management Plan and I am looking forward to the new plan. I thank you the opportunity for commenting on this document.

Sincerely,

Frank Padilla, Jr., SPS I
Fire Management Coordinator

Input 5

Board of Supervisors
County of Los Angeles

MICHAEL D. ANTONOVICH
SUPERVISOR

August 2, 2004

TO: Chief P. Michael Freeman
Los Angeles County Fire Department

FROM: MICHAEL D. ANTONOVICH
Supervisor

SUBJECT: Correspondence from Mr. Woody Smeck

The attached correspondence is requesting the County's comments on the National Park Service's Draft Environmental Impact Statement for a Fire Management Plan at Santa Monica Mountains National Recreation Area.

Please review this matter and take the appropriate action.

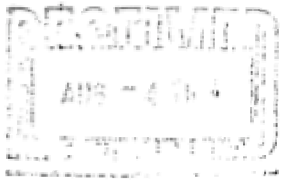
Thank you.

MDA:snj

Attachment

Cc: Mr. Woody Smeck
United States Department of the Interior
Santa Monica Mountains National Recreation Area
401 West Hillcrest Drive
Thousand Oaks, CA 91360-4207

Norm Hickling, Senior Deputy



ROOM 869 KENNETH HAHN HALL OF ADMINISTRATION, 500 WEST TEMPLE STREET, LOS ANGELES, CALIFORNIA 90012
TELEPHONE (213) 974-5555 • FAX (213) 974-1010 • WEBSITE http://antonovich.co.la.ca.us/

Input 6a

COUNTY OF LOS ANGELES
FIRE DEPARTMENT
1320 NORTH EASTERN AVENUE
LOS ANGELES, CALIFORNIA 90063-3294
Fax (323) 265-9948
(323) 881-2401

P. MICHAEL FREEMAN
FIRE CHIEF
FORESTER & FIRE WARDEN

June 21, 2002

Woody Smeck, Acting Superintendent
United States Department of the Interior
National Park Service
Santa Monica Mountains National Recreation Area
401 West Hillcrest Drive
Thousand Oaks, CA 91360-4207

Dear Acting Superintendent Smeck:

COMMENTS REGARDING ENVIRONMENTAL IMPACT STATEMENT - FIRE MANAGEMENT PLAN

Thank you for the opportunity to comment on the Environmental Impact Assessment for the Santa Monica Mountains National Recreation Area (SMMNRA) Fire Management Plan. I believe that we share common values and interests, including the protection of the environment.

Personnel from our Operations Bureau and Forestry Division attended two of the public meetings held in the Santa Monica Mountains (SMM), regarding the range of alternatives being considered for the Fire Management Plan. We listened to comments made by citizens and other agencies and provided input concerning this important task. We note that the SMMNRA is highly unique in natural, cultural, and scenic resources. It includes a highly diverse public with numerous public agencies, jurisdictions and non-profit organizations. I cannot think of another park with such a complex mixture of issues.

I believe that both of our organizations recognize that wildland fires are a major issue in the SMM. Fire can rapidly transform a peaceful and tranquil community into a major catastrophe. Wildland fires in the SMM are generally controllable under moderate weather, but when flames are driven by high winds, low humidity, and in heavy fuels, firefighting becomes more of a directing effort. The most sophisticated firefighting equipment and highly trained personnel have limited suppression success under extreme weather and fuel conditions. The major success only results when this suppression capability is combined with fire prevention efforts.

Recommendations

We highly recommend Alternative #2. This is a broad alternative. It does not favor one strategy over another without analysis of a specific area and resource information, objectives, values to be protected, safety, risk, complexity, and other considerations. This alternative provides the maximum number of tools to be available for performing fuels treatments. This alternative would have the greatest potential benefit. Both firefighters and the public safety would be enhanced, real property and natural and cultural resources protected, and potential suppression costs significantly reduced through the utilization of a wide-range of alternatives. We totally agree that an educated citizenry is imperative to living safely in the SMM.

We believe that it is possible for all the responsible fire agencies to work together to develop a comprehensive fire management plan for the SMM. Each agency has its own mission and concerns, but we all share a common need to find effective solutions. We also have talented and resourceful staff who have the ability to work together for a common cause. Focusing on the reduction of fuel hazards in strategic locations has been our most successful means of protecting life and property.

Data for the SMM is abundant. In the past, we have worked together to develop data including classifying vegetation from an Airborne Visible/Infrared Imaging Spectrometer (AVIRIS) flights over the SMM. This cooperative project with not only your agency but also the University of California at Santa Barbara, National Aeronautics and Space Administration, Riverside Fire Laboratory, and others has resulted in some of the best vegetation and fuels classification to be found in the Nation. Cooperative efforts such as this will result in improvements in our ability to effectively manage wildfire.

Other Alternatives

Below are our concerns regarding Alternatives 1, 3 and 4:

Alternative 1 – It is not possible to conduct the broad scale prescribed burning described in the current NPS vegetation management program. Past history clearly shows that we are not able to put together projects and conduct them on a landscape scale. We strongly opposed to minimizing brush clearance. Brush clearance is not only responsible for helping to protect structures from wildfire but also reduces the potential for a structure fire spreading to the wildland. The creation of a fuel modification zone around structures is vital to fire suppression, firefighters and public safety.

Alternative 3 – Prescribed burning in strategic locations for fuels reduction is often a best management practice. It should not be limited to only resource enhancement. We agree that mosaic burning should be abandoned Brush clearance methods may include the use of fire, biological, mechanical, and hand clearing or modification techniques Education of the public is strongly supported by this Department. We recognize that government and the public must work together to achieve the desired outcomes.

Input 6a continued

Alternative 4 – Limiting vegetation management to only brush clearance is not acceptable. Historically, nearly half of structure losses that occur during catastrophic wildfires result from embers and not direct flame impingement. The strategic reduction of fuels upwind of communities has been demonstrated to be effective in reducing both the number and size of embers falling into these communities. This treatment lessens the potential for loss. We believe that prescribed fires should be considered as one of several fuels treatments. It is definitely not a panacea but should be considered along with biological, hand and mechanical treatment methods or combinations thereof.

Thank you for allowing our comments to be considered regarding your Environmental Impact Statement. Should there be any questions regarding our comments, please contact Assistant Chief Herbert Spitzer at (323) 890-4330.

Sincerely yours,

P. MICHAEL FREEMAN

PMF:lc

Input 6b

United States Department of the Interior
NATIONAL PARK SERVICE
Santa Monica Mountains National Recreation Area
401 W. Hillcrest Drive
Thousand Oaks, California 91360-4207

Y14(SAMO)
September 24, 2004

P. Michael Freeman
Chief, Los Angeles County Fire Department
1320 North Eastern Avenue
Los Angeles, CA 90063-3294

Dear Chief Freeman:

We have received your department's comment letter dated August 4, 2004 regarding our Draft Environmental Impact Statement (DEIS) and Fire Management Plan for the Santa Monica Mountains National Recreation Area (SMMNRA). The comments raise a number of concerns regarding the approaches proposed by our agency in pre-fire planning and fuels management on National Park Service lands within the SMMNRA. The response further states that the department cannot support any of the four alternatives proposed in the DEIS, including the continuation of our existing Fire Management Plan.

We have actively sought the input of the department at all stages of revising our Fire Management Plan, beginning with an initial scoping workshop held in June 2001. A letter from your department dated June 21, 2002 gave us encouragement that our course of action was on the right track; indeed, it strongly supported Alternative 2, which we found to be the preferred alternative. We are understandably confused as to the abrupt change in the department's support of the direction of the DEIS.

We take these concerns very seriously. Without the support and cooperation of the Los Angeles County Fire Department, the National Park Service cannot be successful in implementing a Fire Management Plan to protect lives and property while conserving national park resources. The final paragraph of the comments emphasizes the necessity of our two agencies to work collaboratively, and we cannot agree more. To this end, I propose a meeting between my staff and members of your forestry and weed abatement teams to discuss concerns and find common ground for solutions. My Fire Management Officer Kathryn Kirkpatrick will be containing you shortly to arrange a convenient time and location for the meeting. If you have any questions, please contact Kathy at (805-370-2391) or Fire Education Specialist Marty O'Toole at (805) 370-2364.

Thank you again for your comments. We look forward to working with you in completing our Fire Management Plan.

Sincerely,

Woody Smeck

Woody Smeck
Superintendent

Attachments

cc: FMO, SAMO
David Leininger, LACoFD Forestry Division
5823 Rickenbacker Road
Commerce, CA 90040

Input 6c

United States Department of the Interior
NATIONAL PARK SERVICE
Santa Monica Mountains National Recreation Area
401 W. Hillcrest Drive

Y14 (SAMO)
December 06, 2004

David R. Leininger
Chief, Forestry Division, Los Angeles County Fire Department
5823 Rickenbacker Avenue
Commerce, CA 90040

Dear Chief Leininger:

This letter provides notes on the Draft Fire Management Plan Environmental Impact Statement (DEIS) meeting held in your office on Wednesday November 3, 2004 and our response to your comments. Your concerns regarding the approaches proposed by our agency in pre-fire planning and fuels management on National Park Service (NPS) lands within the Santa Monica Mountains National Recreation Area (SMMNRA) are hopefully captured below.

1. National Fire Plan hazardous fuels reduction proposals – internal review process of SAMO. Clarify the proposal timeline and Park review process as well as proposal parameters.

2. Project criteria of slope, fuels and age class for areas of hazard reduction too limited. Example: homes above steep slopes will require some mitigation in fuels reduction. Additional review criteria such as roof type, access roads, infrastructure, water supply, building construction, fuel condition, topography, structure placement, and community input/local knowledge.

3. Fuel modification standard operating procedure on land adjacent to NPS land: historical, newly acquired Park land and new homes bordering Park lands. Case by case reviews.

4. Include goats in fuel management, they have been used at Big rock and on the Etz Melloy motorway.

5. Brush crusher use in fuels management not mentioned.

6. LA County Fire envisions that the majority of vegetation management projects will be focused adjacent to communities.

Our response to each of these issues is as follows:

1. National Fire Plan hazardous fuels reduction proposals. All projects with federal funding must go through the Park's internal environmental review process. SMMNRA proposes to clarify the region's selection criteria for NFP projects and provide clear and early direction to all partner agencies on project criteria. Project areas, objectives and potential issues will be identified and resolved with partner agencies prior to project submittal.

2. Project criteria of slope, fuels and age class for areas of hazard reduction. SMMNRA welcomes the opportunity to include additional criteria for project evaluation. The DEIS analysis was an initial effort to evaluate projects with objective criteria and make those

Input 6c continued

3. Fuel modification on land adjacent to NPS land: historical, newly acquired Park land and new homes bordering Park. In general, the Park provides fuel modification (brush clearance) on all Park properties that have historically been cleared to protect homes that were built close to Park property prior to Park acquisition. We are updating the tables in the DEIS and all properties will be considered as case by case reviews. Fuel modification (brush clearance), clearing native vegetation on parkland in order to accommodate new development on adjacent private land would not be permitted under NPS Management Policies (2001) and 16 USC Sect 1-4 and 460kk. We prefer the property owner site their development 200 feet from park boundary and have worked with the County to ensure this happens. The Park will continue to work with LA County's Fuel Modification Unit to develop appropriate fuel modification plans for any new development adjacent to park property.

4. Goats. We view goats as one of several methods to achieve fuel modification and will make a note to this effect in the DEIS. It is important to remember that the DEIS applies only to actions by NPS on park property. We have historically performed mechanical fuel modification to reduce fuel loads on our properties and do not foresee using goats in these areas. This is the reason that goats are not identified as one of the methods to be used in the park's fuel modification program.

5. Brush crusher use. We consider the use of the brush crusher as a method to facilitate prescribed burning in chaparral or sage scrub under certain seasonal conditions. We have not addressed the use of the brush crusher because the DEIS applies only to actions by NPS on park property and there is no specific prescribed burn project proposed on Park property that would require the brush crusher. In the event that a strategic prescribed burn project is identified for park property, the use of the brush crusher to implement the project would be evaluated.

6. Vegetation management projects will be focused adjacent to communities. NPS concurs that the most effective projects to limit structure loss are those located adjacent to development.

If this meets your needs this will be included in the final EIS. Please contact Kathy Kirkpatrick at (805) 370-2391 if you have any questions regarding this information.

Sincerely,

Woody Smeck

Woody Smeck

Input 6d

COUNTY OF LOS ANGELES

FIRE DEPARTMENT

1320 NORTH EASTERN AVENUE
LOS ANGELES, CALIFORNIA 90063-3294
(323) 890-4330

P. MICHAEL FREEMAN
FIRE CHIEF
FORESTER & FIRE WARDEN
August 19, 2005

Woody Smeck, Superintendent
United States Department of the Interior
National Parks Service
Santa Monica Mountains National Recreational Area
401 West Hillcrest Drive
Thousand Oaks, CA 91360

Dear Mr. Smeck:

SUPPORT OF THE FINAL DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR THE SANTA MONICA MOUNTAINS RECREATION AREA "FIRE MANAGEMENT PLAN" – "WESTERN LOS ANGELES COUNTY" REVISED (EIR #2062/2004)

This communiqué is intended to confirm our commitment to collaboratively work with the National Park Service (NPS) in support of the implementation of a fire management policy in the Santa Monica Mountains National Recreation Area (SMMNRA). Although both agencies have distinct missions and concerns, we agree that *firefighter* and public safety are the first priority in the development of a fire management plan. The fostering of open dialogue between agencies has been instrumental to the process of bridging fire plan policy and producing meaningful pre-fire management solutions.

In our Draft Environmental Impact Statement (DEIS) response, dated August 4, 2004, we *outlined* several *pre-fire* management policy issues not clearly stated or addressed in the DEIS. These concerns were primarily the result of previous unsuccessful attempts to plan and implement effective pre-fire management projects with SMMNRA staff. The NPS response, dated July 20, 2005, *summarized the inclusion of our concerns in the final EIS*. Specifically, concerns related to defensible space, vegetation management, comprehensive strategy, environmental compliance/age mosaic, conflicts with Los Angeles County Fire Plan and the 2001 Federal *Wildland Fire Management Policy guiding principle* #1, "firefighter and public safety are the first priority in every fire management policy".

Additionally, your correspondence addressed six (6) issues of concern identified by our Department in the pre-fire planning meeting held in November 2004. The six (6) issues of concern are listed as follows:

- Include goats in fuel management.
- Brush crusher/gravity roller in fuels management not mentioned.

SERVING THE UNINCORPORATED AREAS OF LOS ANGELES COUNTY AND THE CITIES OF:

AGOURA HILLS	BRADBURY	CUDAHY	HAWTHORNE	LA MIRADA	MALIBU	POMONA	SIGNAL HILL
ARTESIA	CALABASAS	DIAMOND BAR	HIDDEN HILLS	LA PUENTE	MAYWOOD	RANCHO PALOS VERDES	SOUTH EL MONTE
AZUSA	CARSON	DUARTE	HUNTINGTON PARK	LAKEWOOD	NORWALK	ROLLING HILLS	SOUTH GATE
BALDWIN PARK	CERRITOS	EL MONTE	INDUSTRY	LANCASTER	PALMDALE	ROLLING HILLS ESTATES	TEMPLE CITY
BELL	CLAREMONT	GARDENA	INGLEWOOD	LAWNDALE	PALOS VERDES ESTATES	ROSEMEAD	WALNUT
BELL GARDENS	COMMERCE	GLENDORA	IRWINDALE	LOMITA	PARAMOUNT	SAN DIMAS	WEST HOLLYWOOD
BELLFLOWER	COVINA	HAWAIIAN GARDENS	LA CANADA-FLINTRIDGE	LYNWOOD	PICO RIVERA	SANTA CLARITA	WESTLAKE VILLAGE
			LA HABRA				WHITTIER

Input 6d continued

- Focus vegetation management projects adjacent to communities.
- Clarify National Fire Plan hazardous fuels reduction proposals, process and timelines.
- Expand strategic fuel criteria to include roof type, access roads, infrastructure, water supply, building construction, structure placement and community input/local knowledge.
- Fuel Modification practices on NPS lands adjacent to development: historical, newly acquired park land and new homes bordering parklands.

The County of Los Angeles Fire Department agrees with the NPS proposals submitted to address the six (6) issues of concern in pre-fire planning and fuels management within and adjacent to the SMMNRA. We are also satisfied with the clarification and inclusion of the pre-fire management policy issues in the final EIS. As a result, the County of Los Angeles Fire Department reaffirms our support for alternative #2.

If you have any additional questions, please contact this office at (323) 890-4330.

Very truly yours,

DAVID R. LEININGER, CHIEF, FORESTRY DIVISION
PREVENTION SERVICES BUREAU

DRL:sc

Input 7

COUNTY OF LOS ANGELES
DEPARTMENT OF PARKS AND RECREATION
"Creating Community Through People, Parks and Programs"

Tim Gallagher, Director

September 2, 2004

RECEIVED
SEP 9 2004
SMMNRA-8540

Woody Smeck, Superintendent
National Parks Service
Santa Monica Mountains National Recreation Area
Attn: Fire Management Plan
401 West Hillcrest Drive
Thousand Oaks, CA 91360

Dear Mr. Smeck:

NOTICE OF AVAILABILITY OF A DRAFT ENVIRONMENTAL IMPACT REPORT (EIR) FOR THE FIRE MANAGEMENT PLAN

The Draft EIR for the Santa Monica Mountains National Recreation Area Fire Management Plan has been reviewed for potential impact on the facilities of this Department. Development of the project as described in the Draft EIR will not impact facilities under the jurisdiction of this Department.

Thank you for including this Department in the review of this environmental document. If we may be of further assistance, please contact me at (213) 351-5133.

Sincerely,

Bryan Moscardini, Park Project Coordinator for
Joan Rupert, Section Head

Executive Offices • 433 South Vermont Avenue • Los Angeles, CA 90020-1975 • (213) 738-2961

Input 8

Ventura County
Air Pollution
Control District

669 County Square Dr
Ventura, California 93003

tel 805/645-1400
fax 805/645-1444
www.vcapcd.org

Michael Villegas
Air Pollution Control Officer

September 15, 2004 via Email: samo_fire@nps.gov

Woody Smeck,
Superintendent
Santa Monica Mountains National Recreation Area
401 West Hillcrest Drive
Thousand Oaks, CA 91360-4207

Subject: Request for Review of Draft Environmental Impact Statement for Santa Monica Mountains National Recreation Area Fire Management Plan

Dear Mr. Smeck:

Air Pollution Control District staff has reviewed the subject project environmental impact statement, which evaluates potential environmental impacts from implementation of various fire management alternatives in the Santa Monica Mountains National Recreation Area (SMMNRA). Every federal park area with burnable vegetation must have a fire management plan approved by the superintendent. The selected alternative will become the basis of the SMMNRA Fire Management Plan, which is the five-year implementation plan for the Park's fire management actions. The project area is situated between the Los Angeles Basin and the San Fernando Valley in Los Angeles County and the Oxnard Plain in Ventura County.

Section IV (F – Air Quality) of the environmental impact statement (EIS) addresses potential air quality impacts from the implementation of the fire management alternatives. Type of impact, duration of impact and intensity of impact are analyzed for each alternative with calculation of total suspended particulate emissions serving as proxy for other pollutants.

Please be advised that the Ventura County Air Pollution Control District requires a smoke management plan and a burn permit from the Ventura County Fire Department. The District's smoke management plan requirements can be found on our website at www.vcapcd.org.

We recommend that offroad diesel-powered equipment used for mechanical fuel reduction not be left idling more than five minutes and be maintained in good condition and in proper tune as per manufacturers' specifications to reduce particulate and ozone precursor emissions.

Thank you for the opportunity to comment on this Plan. If you have any questions, please call me at (805) 645-1426 or email me at alicia@vcapcd.org.

Sincerely,

s/s

Input 9

California Native Plant Society

Los Angeles/Santa Monica Mountains Chapter

3908 Mandeville Canyon Road
Los Angeles, California 90049
September 15, 2004

Woody Smeck
Superintendent
Santa Monica Mountains National Recreation Area
National Park Service
401 W. Hillcrest Drive
Thousand Oaks, California 91360

ATTN: Fire Management Plan Draft EIS

Dear Superintendent Smeck:

The Los Angeles/Santa Monica Mountains Chapter of California Native Plant Society has about 500 members. We are very concerned about the impacts of wildland fire in the urban interface on both humans and the globally-endangered Mediterranean ecosystems of southern California.

The Fire Management Plan Draft EIS for the Santa Monica Mountains National Recreation Area has been well written and, with the management portions removed, could well stand as an excellent natural history of the Santa Monica Mountains.

The Fire Management Plan itself seems to heavily favor humans and invasive plants over natural resources, however.

Comments:

1. Why is "fuel" apparently defined as chaparral and native plants, though the most common sources of ignition are non-native grasses, thistles, mustards and horticultural plantings (e.g. conifers, eucalypts, palms)?

2. Why isn't there a strong bias toward removing non-native plants instead of a constant bias toward type-conversion of native habitat to eroded, ruderal slopes?

3. With highly erodable hillsides throughout the Santa Monica Mountains, why does this document not support well-established complex root systems of chaparral, instead of emphasizing the need to disturb and destroy what has taken many decades or even centuries to produce?

4. In Figure 3-22 is the Change in Fire Hazard and Ecological Risk Following Fuels Treatment solely based on studies of Ceanothus megacarpus? There are few, if any, studies of chaparral habitat older than 36 years so why is there any certainty that the highly biodiverse chaparral systems will not be affected over time by "fuel" modification methods based on a time interval convenient to fire managers?

Input 9 continued

5. Where is the consideration of siltation of streams, mudslides and slumps, and flooding caused by the four alternatives? We have been told by brush clearance inspectors for insurance companies and County Fire crews that they do not care about those issues. Aren't the geological impacts on humans and natural resources important? There is information in the text on these impacts but only as part of the natural history. Where do the Alternatives discuss these impacts in detail and how they will be mitigated?

6. How will Strategic Fuels Reduction prevent catastrophic fires that occur during seasons of Santa Ana winds? The information in the text seems to support the idea that catastrophic fires in Malibu and Topanga Canyons are inevitable, given Santa Ana winds > 60 mph blowing directly down those canyons. Roads are the common ignition points for wildfires and roads run down the center of each of those canyons.

7. Will Strategic Fuels Reduction remove the most common plant sources of ignition along roads, e.g. non-native grasses, mustards, thistles, broom, and escaped landscaping elements?

8. What are the follow-up plans for Strategic Fuels Reduction in an area? Will there be weed management? Erosion control? Will there be any attempt to preserve/conserve the native habitat?

9. Page 4-17: How can wildfire suppression methods which emphasize the destruction of native habitat have "a beneficial impact on the interaction between habitat fragmentation and wildfire impacts"? The reason: "because it reduces fire size and the amount of area repeatedly burned in the high fire frequency environment of the Santa Monica Mountains" is ludicrous. Conversion of healthy, relatively non-flammable native habitat to ruderal, erodable slopes simply increases the possibility of a greater frequency of low-temperature fires. Where is the rationale that any method will stop, or even slow down, catastrophic fires?

10. Page 4-17: Where is the rationale for "No new fuel modification on parkland is anticipated from new development?

Where are the plans for the other jurisdictions in the Santa Monica Mountains to control land use changes to the benefit of the environment, to support reducing the frequency of wildfires through limitations on use and placement of flammable or invasive landscaping material and the use of flammable construction materials, as well as zoning/permitting restrictions that absolutely require 100-200 foot buffers between all structures and parkland boundaries? Natural resources survived 50 to 100 years or more between wildfires without fire management - before humans settled so densely in wildland areas.

Where are the fire suppression plans for the humans living in this ecosystem? Education is too weak a tool. Humans are not a globally endangered ecosystem. Mediterranean ecosystems are endangered around the world, most often by planning that ignores the values and strengths of these natural ecosystems.

11. Page 4-18: Alternative 2 has Strategic Fuels Reduction, Ecological Prescribed Fire, and Mechanical Fuel Reduction. See the previous questions about the value of Strategic Fuels Reduction.

Aren't grasslands the only habitat that might benefit from Ecological Prescribed Fire? Even then wouldn't there be years of follow-up weed management? What is the fire interval necessary under this method to encourage Valley Oaks, Coast Live Oaks and native bulbs, annuals and perennials as well as other rare native grassland plants to thrive under this fire regimen? Hasn't Ecological Prescribed Fire been unable to eliminate non-natives with well-established seed banks, such as milk thistle? What happens to the native seed banks under this fire regimen?

Input 9 continued

Mechanical Fuel Reduction: Will all dead material be removed? We have pictures of chipped material sprayed into healthy chaparral canopy, damaging those trees' ability to process nutrients. We also have pictures of healthy non-flammable trees such as toyon and sugarbush cut down and thrown over the edge of the slope by a powerline road, creating an extreme fuel hazard that did not previously exist. This work was done by a crew of prisoners under the direction of a County Fireman. Many slopes have been denuded of shrubs without any of the underlying non-native grasses being disturbed. Is this what is meant by "Mechanical Fuel Reduction" - people mechanically remove any healthy native elements, create or increase fire hazards along roads and blame the increased fire frequency on what was healthy chaparral? Smilo grass and yellow star thistle have spread widely along that powerline access road since those "mechanical fuel reduction" occurrences.

We do not support any of the Alternatives as defined in the text.

We would support a revised Alternative 4 if the emphasis were on non-native fuels reduction and not on the removal of healthy native plants and if there were a strong follow-up weed management strategy. The mechanical fuel reduction methods would have to be limited to mowing, using weed removal hand tools and herbicides for serious infestations in controlled circumstances by approved applicators. The cut material would be removed to a site where it could be composted safely. This revised Alternative 4 would contain a strong program by Park and Fire jurisdictions to create mountain development fire ordinances and regulations with the various bodies governing land use in the Santa Monica Mountains to place restrictions on construction and landscaping (as discussed previously in this letter).

Fire management in SMMNRA has to emphasize the protection of the natural resources first. That is why SMMNRA was created.

The human part of this ecosystem has at least an equal responsibility to help protect the health and future of habitats that add to their property values, integrate the mountain slopes in patterns of beauty and conserve water for everyone's use.

Please send all notices and other documents relating to the Fire Management Plan to me at the above address.

Thank you.

Sincerely,
Betsey Landis
President
Los Angeles/Santa Monica Mountains Chapter
California Native Plant Society

Input 10

PACIFIC PALISADES COMMUNITY COUNCIL

The Eyes, Ears, and Voice of the Pacific Palisades Community
Serving the residents and businesses of Pacific Palisades since 1973
Post Office Box 1131, Pacific Palisades, California 90272

September 15, 2004

Woody Smeck, Superintendent
National Park Service
Santa Monica Mountains National Recreation Area (SMMNRA)
401 West Hillcrest Drive
Thousand Oaks, CA 91360-4207

Subject: Comments re SMMNRA Fire Management Plan Draft EIS

Dear Mr. Smeck:

I am writing on behalf of the Pacific Palisades Community Council (PPCC), a nonprofit organization formed 32 years ago to be a forum for community issues, and, to be an advocate for the Pacific Palisades to government and private agencies upon those issues where there is broad community agreement.

Wildfire Research Network (WRN) has shared with the PPCC its research and analysis of the SMMNRA Fire Management Plan Draft EIS. After consideration, we support the NPS recommendation of Alternative 2 as the appropriate strategy for the new Fire Management Plan.

We share WRN's concern that the criteria used to select candidate areas for Strategic Fuel Modification (fig. 3-20, p. 3-34) does not take into account the impact of brush areas upwind of vulnerable inhabited areas. The most destructive fires that occur in the Santa Mountains, in terms of cumulative acreage burned and homes/structures destroyed are fires exacerbated by Santa Ana winds. As WRN points out, Santa Ana wind driven fires can quickly sweep through corridors from ignition origins several miles distant. In the 1978 Mandeville Canyon, 1993 Old Topanga and 1976 Kanan fires flames traveled six miles in eight hours, six miles in four and one-quarter hours, and thirteen miles in two hours, respectively. In it well documented that this phenomena can occur even where the brush is considerably less than 35 years old. The areas to the north and east of Palisades as well as inland of Topanga/Malibu coastline are such areas of concern.

PPCC joins with WRN to encourage the ongoing NPS coordination with other ownerships and fire agencies responsible for fire prevention and suppression in the SMMNRA and continued effort to generate an integrated plan for the whole area.

Norman Kulla
Chair

cc: Chief William R. Bamattre, LAFD
Chief P. Michael Freeman, LACoFD

www.pp90272.org

Input 11

PACIFIC PALISADES RESIDENTS ASSOCIATION, INC.

POST OFFICE BOX 617
PACIFIC PALISADES
CALIFORNIA 90272
(310) 454-4254

September 14, 2004

National Park System
Superintendent Woody Smeck, SMMNRA
401 W. Hillcrest Drive
Thousand Oaks, CA 91360-4207

Re: Draft EIS Fire Management Plan, SMMNRA

Pacific Palisades Residents Association, a community-wide voluntary planning and environment organization, supports selection of Alternative 2 as the appropriate strategy for the new SMMNRA Fire Management Plan.

PPRA is concerned that the criteria used to select candidate areas for Strategic Fuel Modification do not give weight to some brush areas upwind of very vulnerable inhabited areas. Santa Ana winds can drive fires quickly down these wind corridors to homes several miles from ignition sources. In the 1978 Mandeville Canyon fire, the 1993 Old Topanga fire and the 1996 Calabasas fire flames traveled from deep inland to the coast in eight, four and two hours respectively. It is well documented that this phenomenon can occur even where the brush is considerably less than 35 years old. Examples of areas of concern in this respect are:

* north and east of Pacific Palisades,
* inland from the Malibu coastline.

The board of PPRA appreciates the detailed technical information presented throughout the Draft EIS.. We encourage ongoing NPS coordination with the ownerships and fire agencies responsible for fire prevention and suppression in the SMMNRA. We urge continued efforts to generate an integrated plan for the whole area. We note that the proposed plan, however excellent it is, covers only 15 percent of the land area of SMMNRA.

Sincerely Yours,

Frances Tibbits

Frances Tibbits, Corresponding Secretary

cc: Los Angeles City Fire Chief William Bamattre
200 No. Main St. , 18th Floor, Los Angeles CA 90012

Input 12

Wildfire Research Network
415 S. Topanga Canyon Blvd. #190 Topanga CA 90290
(310)289-2128 wildfireresearch@yahoo.com

Woody Smeck, Superintendent
National Park Service
Santa Monica Mountains National Recreation Area
401 West Hillcrest Drive
Thousand Oaks, CA 91360-4207

September 15, 2004

Subject: Comments re: SMMNRA Fire Management Plan Draft EIS

Wildfire Research Network is a nonprofit research organization dedicated to developing and sharing information on the phenomena, dynamics and costs of controlling wildfires while meeting long term environmental and safe urban development objectives.

WRN supports the NPS recommendation of Alternative 2 as the appropriate strategy for the new SMMNRA Fire Management Plan and appreciates the detailed technical information presented throughout the document.

We are concerned that the criteria used to select candidate areas for Strategic Fuel Modification (fig. 3-20, p.3-34) do not give preferences to brush areas upwind of fire vulnerable inhabited areas. The most destructive fires that occur in the Santa Monica mountains, in terms of cumulative acreage burned and homes/structures destroyed, are fires driven by Santa Ana winds. These fires can quickly sweep through corridors from ignition origins several miles distant. In the '78 Mandeville Canyon '93 Old Topanga and '78 Kanan fires flames traveled from deep inland to the coast in 8, 4, and 2 hours respectively. It is well documented that these phenomena can occur even when brush is considerably less than 35 years old. Examples of areas of concern are:

- North and east of Pacific Palisades
- Inland of Topanga/Malibu coastline

WRN encourages the ongoing NPS coordination with other ownerships and fire agencies responsible for fire prevention and suppression in the SMMNRA and continued effort to generate and integrated plan for the whole area.

Wildfire Research Network

Bob Cavage

R. L. Cavage, President

cc: Chief P. Michael Freeman , LA County Fire Department

Input 13

Stephanie Wilson Blanc
1000 El Medio Avenue, Pacific Palisades, CA 90272 FAX 310-454-4310 PHONE 310-459-3131

National Park Service
401 W. Hillcrest Drive
Thousand Oaks, CA 91360
Attn: Fire Management Plan comments

Sept. 14, 2004

Dear NPS:

1. I am a fifth generation native of California and a resident of Los Angeles. My family has grown up in the Los Angeles area for four generations. It is with great sadness I have watched the natural landscape disappear from our basin. I have had first hand experience here with untrammeled land and freely flowing streams and rivers. With that knowledge comes a respect for the power and beauty of our relatively natural wild lands. The promise of the Santa Monica Mountain's protection as a park wilderness has been some comfort to me and many other like me. I have held the hope that we would hold on to a small portion of the remaining essential wild California both for future generations to enjoy and for its intrinsic value of its own sentient self. Where is it written that we should be able to endanger entire systems? What I do not understand is: why you are planning to destroy more of what little remains in order to save it?
2. I have read your 'Draft Environmental Impact Statement Fire Management Plan' [FMP] and attended one of your public meetings. I am responding accordingly. Although there is a great deal of brilliant analysis within your FMP, your conclusions show that the analysis was either not followed and/ or patently ignored. Why is that?
3. My critiques follows from the research contained there in, in particular:
   a. Currently the Santa Monica Mountains have endured more frequent burning due to human hands.
   b. Much of our grasslands is actually type converted from frequent burning and therein lays the danger of more burning or mechanical fuel reduction.
   c. Grasslands are easily
      1. burned
      2. invaded by exotics that are exceeding flammable and disrupt the natural ecosystem and
      3. penetrated by humans, the #1 cause of fires by far.
   d. Young chaparral and degraded ecosystems burn as easily as old-growth chaparral.

Input 13 continued

4. It is my understanding that the **NPS is mandated to both protect the natural resources and manage wild fire risk.** Your policy choice in the FMP of Preferred Alternative 2 [page 2-18] is a **betrayal of you mandate.** How is it that preferred alternative 2 was chosen while your have a mandated mission as steward of our wild parkland?
5. Where have you shown that follow up mitigation will happen after many acres of wild parkland are destroyed unnaturally, annually?
6. What is to prevent type conversion of these ancient Elfin Forests [The California Chaparral, an Elfin Forest by W. S. Head] to flammable grasslands?
7. It is tantamount to fact that there is less than little funding for mitigation work. It is obvious to all that once these lands are destroyed there will be little or no follow through. In fact there may be little or no money to even keep the highly flammable fuel mowed once sections of these Elfin forests are destroyed. Do you realize that in fact that you are putting forth a policy that will lay yet another fuse for yet another man made fire?
8. Do you understand that any roads leading to these Elfin forests will add to the potential of fire? There is a direct correlation between built roads and the occurrence of fire.
9. Using 'equipment' to gain access to interior park areas to 'reduce the biomass' there will ultimately have a worse effect than the 'adverse effect' caused by repeated burns. Equipment destroys the integrity of the fragile ecosystem from the mycorrhizal fungi, soil structure, and seedbed to more macro concerns of soil stability, and watershed. Do you understand this, and if you do why are you proposing to use equipment?
10. While you freely admit that your studies are incomplete or non existent for the insects populations of these Elfin Forests you are all too willing to destroy large tracts in a highly un natural manner [FMP: 'not consider if not studied']. Do you understand that we are in a great global pollinator crisis?
11. If the European bee population were to fail, and this is a possibility; wouldn't you all look quite ignorant and careless to be the cause of endangering our native bee population?
12. Do you understand that many of our native bees provide the same pollinating services as European Honeybees?
13. What do you understand at a global level of the pollinator crises?
14. Do you think that we live independently, apart from the entire issue of pollination?
15. Can we live without one or two or more native insects that quite possibly make their homes in the communities you plan to destroy?
16. Are you aware of the great effort and cost it took to re establish the El Segundo blue butterfly?
17. What was the cost?
18. Can you [we] afford the cost?
19. Where do you show you understanding of the arthropod community?
20. Where is the time and funding for 2-22? How is it moral that if something is not understood it can be destroyed?

21. In 2-21 you state that additional research and monitoring should be undertaken to further understand the relationship between fire and habitat fragmentation. How can this be done when you have already set your priority to implement preferred alternative 2? Where do you show that you understand that you may be dooming communities of plants and animals?
22. Although you state in 2-19 that mitigation actions should be taken, your policy choice of preferred alternative 2 will perpetuate the problem of fragmentation of wild lands. Are you aware of this?
23. How do you know whether your policy of preferred alternative 2 will be the last nail in the precipitating a total failure of many life forms?
24. You state in the text of the FMP, 2-27, that inappropriately sited development creates a fire safety hazard and a degraded environment. Why have you failed to address this problem in your proposal?
25. Why are you not working towards co-operation with all the different Santa Monica Mountains landowners and managers as mandated [FMP - 2-27]? [See below #'s 27 & 28]
26. It is my observation that in mandated fire clearance all the Eucalyptus, Acacias, Pines, and Pampas grass, etc. are regularly SPARED from clearing. Meanwhile the chaparral -with a few species exception- is regularly cut down. These priorities make no sense. Where are the guidelines regarding invasive and highly flammable exotics in adjacent wild lands?
27. Why are you not leading the crusade for the eventual elimination of the above invasive plants, which are ever so, fuse like? [See Temescale Canyon for instance where the ancient chaparral has been cleared and a forest of Pampas, Eucalyptus, Palms, etc has remained and increased at an alarming rate].
28. Since humans are the greatest cause of fire, more effort needs to be spent on the problems they create. With your mandate of preservation you are in the best and most unique position to effect change and lead others to more sensitive solutions. In all areas of our lives the call is now for coalition building, not for posing enemies and polarization. Of course, the enemy is not NPS, chaparral, nor ignorant people. There are solutions to living in our wild lands -- but those solutions are not found in you proposed mechanical fuel reduction or in burning areas of our Elfin forests. It is frightening that you would actually consider preferred alternative 2 a workable solution. This is a crazy idea. Burn this idea up or mechanically tear it out of your heart. Work with established concerned groups, like the Native Plant Society, botanical gardens, Xerces society, California Exotic Pest Plant Council, etc. and bring about healing change for all involved. Follow your own research. BELIEVE ME THIS IS TRUELY YOUR MANDATE.

Thank you for your attention and for giving me an opportunity to respond.

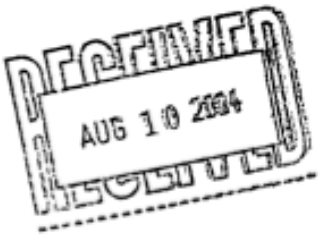
Sincerely,

Stephanie Blanc

Input 14

August 1, 2004

To: Woody Smeck, Superintendent
Santa Monica Mountains National Recreation Area
401 West Hillcrest Drive
Thousand Oaks, CA 91360-4207



From: Don P. Mullally Don P. Mullally
10418 Gothic Avenue
Granada Hills, CA 91344

Subject: Fire Management Plan.
Information and suggestions for use in the DEIS of this plan in 2004 for the Santa Monica Mountains National Recreation Area 4 pp.

Apparently your staff knows all about wildfires, wrote a DEIS and has three versions of it ready for public scrutiny and comments. Since I am not familiar with your area and problems, I will not pass judgment on any part of it.

I have endeavored to gather information based on observations I have made on wildfires in the Santa Susana Mountains, particularly the Santa Clarita Woodlands Park. You may wish to adopt some of my material.

1. Vegetation in public wilderness parks should not be surrendered to wildfires. Except for land, forests, plants and plant communities, and wildlife are their primary assets. Being carefully selected and costly areas, the parks deserve protection as much as any other type of property.

2. In the event of fire, early detection is imperative. Too often fires go undetected or unreported until they are too large for quick suppression.

3. Fast suppression is imperative. Water bearing aircraft may be unavailable or slow to arrive. Too much time is also required to put fire fighting crews and heavy equipment on the line. Fast response by aircraft seems to be the best answer.

4. When outside fire departments arrive at a fire, park employees should stress the park status of the land and emphasize the need for superior fire control. The departments are apt to linger on the edges of a burn and watch the fire grow and move, as they commonly do on undeveloped land.

5. In this fire-prone region, useful wide fire roads are imperative. Men and equipment are not likely to enter burning or not-yet burning vegetation if such roads are not present. Roads are needed for both ingress and egress if dangerous conditions develop. Ideally, roads should have two ends and be open at each end. Parklands should be boxed in on all sides by roads. Very large parks also need one or two other roads in their central areas. Roads can also serve as park trails.

1

Weather permitting, canyons and other areas between roads can be expected to burn if fire is not stopped at a road. Roads should be made soon, not five or ten years from now. Peripheral roads are also valuable for preventing park fires from invading private property and developments.

6. The destructiveness of fires is often magnified by remote backfires ignited by helicopters bearing flammable chemicals. The intense heat locally generated by burning chemicals combined with burning vegetation can practically sterilize the ground. Few native herbs and crown sprouting trees and shrubs seem to appear after the rains commence.

   Extreme sudden heat and flames may lead to the nearly complete incineration of vegetation on mountain ridges and major parts of watersheds. Don't expect the survival of pockets of vegetation that can be useful to wildlife in the post-fire period for food and cover, and to the burned vegetation for propagules. Natural burning fires tend to leave unburned patches behind them. Unburned patches may even save locally scarce species from local extinction.

7. Accurate vegetation mapping is imperative in wilderness parks. If the park department knows where the rarest, most useful and scenic types are, they can advise fire departments as to their locations and request special measures for their protection. Some vegetation types are abundant and not special, and they are more expendable. In fact, some require occasional fire.

8. Wetlands, and particularly the riparian zones bordering them, are prone to severe damage from wildfires. Damages come from burning dead plant material on the ground and from highly heated air. The simplest form of fire protection of riparian zones is manual removal of dead fallen logs, limbs, branches, logjams, roots, and brush. When these materials burn close to living tree trunks and saplings, they kill them outright or set them afire close to ground level. Many trees die and eventually fall, and many others are left with fire scars open to decay and the next fire. Riparian fires burn rather slowly, but the damage gets done.

   Removing brush from the outer edges of the riparian zone is also useful. However, this is expensive, slow, time-consuming work that may be considered harmful to the ecology and general appearance of the environment. Watering down borders during fires can be very helpful, but roads must be present for the task to be performed.

9. Trees of all sizes of Southern California black walnut, Flowering ash, California bay laurel, Western sycamore, Mexican elderberry, alder, Fremont and Black cottonwood, and the willows are especially susceptible to fires. All of these trees are important in riparian zones, and some are restricted to it. They are our deciduous trees. Even low fires in thickly growing tall grasses and short shrubs, particularly stands, usually kill tree trunks. Immediately after the fire, trees may appear to be OK, but are actually dead above ground level. Within six months,

most of these produce multiple stems (alder and cottonwoods excepted) that will eventually become sizeable tree trunks. However multiple trunks will never achieve the size of single trunks. Dead trunks serve woodpeckers for a time, eventually fall and serve invertebrates, lizards, rodents, etc. However, they are also fuel for future fires.

To prevent kill-back of these trees, crews of forest or fire workers need to manually remove dead grasses, wood, and shrubs around tree trunks. A 2-3 foot clear zone is recommended.

Valley oak may or may not qualify for the above treatment. Of the oak trees, this species is most susceptible to trunk injury from fire. Nor does it crown sprout except as sapling size. Surface roots, broken roots, and scars are ignited; fire internalizes in the trunks, and the trees frequently die or fail. Hot fires even kill cambrium and phloem in trunks and limbs

10. In my opinion, thick growth of dead stalks of the non-native or alien tall grasses is, from the standpoint of fire, the most dangerous vegetation in the hills of Los Angeles and neighboring counties. The dead vegetation ignites easily; spreads fire rapidly, is fanned by breezes across open ground, and soon transmits fire to other types of vegetation, particularly chaparral and coastal sage scrub. Flames then become higher and hotter.

    To kill seeds and minimize the height of grasses, mechanical mowing or broad expanses in late March or April is recommended. Otherwise, when dry cut plants down along roads, major trails, and use areas. The less of it around the better. Flammable associated plants include the mustards, milk thistle, yellow star thistle, wild lettuce, and other alien annual plants.

11. Woodland chaparral, a vegetation type frequently forming a thin shrub understory in oak forest and woodland, is not highly inflammable. I have witnessed fire crews cutting poison oak, toyon, redberry, snowberry, and seedlings beneath oaks, but I don't recommend the practice.

12. Fire crews should include an advisor who recognizes major species of trees and shrubs. Advisors can prevent the cutting of seedlings and saplings of particularly valuable trees, trees that are the hope of the future. During the Santa Susana fire of October 25 to November 2, 2003, sapling size Valley oaks were needlessly cut off. Some crown sprouted during 2004.

13. My observations indicate that it is generally preferable to put out fires in parks rather than magnify them with backfires. Brushy parks are not places for fire departments to experiment by using helicopters to start remote backfires, enlarging fires, creating infernos, burning up natural vegetation to get rid of fuel loads. Controlled burns are very useful in conifer forests, but we don't have these on the hills of southern California. Fire departments love to set backfires along

roads and trails, and some of these may be useful. Others are a waste of time, work, and money. During the 2003 fire in the Santa Susana Mountains, vegetation along the summit road on the north side of Oat Mountain was ignited by backfiring in an effort to burn-out vegetation down slope. A storm was coming, humidity was rising, and a mile of backfire went out on its own where started beside the road.

A helicopter set a backfire on a ridge leading to the crest of the mountain range and the Orcutt Ranch. Largely due to the change in weather the fire went out quickly and did no good.

Even though the fire was going out on its own, another plan was in motion to burn out the eastern parts of the Santa Clarita Woodlands Park, an area largely forested in East, Weldon, and Leaming Canyons. Late one afternoon a helicopter bearing the inflammables was already in the air. I happened to arrive on the scene and talked to the top brass of the fire departments congregated at a site about the harmfulness of the operation. As a result, the canyon was not ignited, and it now serves as the best recreational area of the park and the whole area. What a relief it was to find the canyons green and hardly touched by fire the next morning!

One argument for burning East Canyon was to eliminate fuel that could lead to fire jumping Highways 14 and 5 and entering wilderness to the east. It happened that on or about July 20-21, 2004, a new wildfire broke out east of Highway 14 that incinerated Elsmere, Placerita, and Whitney Canyons and a large wilderness area serving as mitigation for a housing development. Burning out East Canyon in 2003 would have been a tremendous waste and would have done not any good at all.

Cc: Senator Barbara Boxer
Senator Diana Feinstein

4

Input 15

Pamela Palmer
<ppalmer@artecho.com
>
09/15/2004 01:20 PM
MST

To: samo_fire@nps.gov
cc:
Subject: Revision of policy for management of Santa Monica Mountain Recreation Area

National Park Service
401 W. Hillcrest Drive
Thousand Oaks, CA 91360
Attn: Fire Management Plan comments
Sept. 15, 2004

Re: Possible Revisions in your policy for management of the wildlands in your jurisdiction

Dear National Park Service,

I am deeply concerned that stated changes in management of the wildlands in your jurisdiction will adversely effect the Santa Monica Mountains National Recreation Area There are many complex issues involved, with possible irreversible ramifications for the Santa Monica Mountains.

Current studies show that reasonable clearing of100 ft. at the wild/urban interface provides very nearly as much protection from wildland fires as would clearing much farther from structures, or as would clearing additional acres in interior parkland to reduce fuel volume. Defensible space around homes must be maintained to be fire-safe - but that is all we need Let's use the LEAST INTRUSIVE methods to combat the risk of fire, without destroying a very sensitive ecosystem that has been set aside as a wildlife habitat and a place where we can interact with the wildlife we have protected Let's use measures that will help ensure that the Santa Monica Mountains National Recreation Area will continue to be a refuge for wildlife in a strong plant community and will remain so for generations to come, as, I believe is a goal of the National Park Service

I am a Licensed Landscape Architect for the State of California and, as such, am a steward of this land I feel that how this land is managed is of utmost importance to the health of our delicate environment I feel strongly that any change in the management of the wildlands of the Santa Monica Mountains National Recreation Area should be a matter of Public Vote.

Sincerely,
Pamela Palmer, Landscape Architect
ARTECHO Landscape Architecture
1639 Electric Avenue, Suite A
Venice, CA 90291

by e-mail

SMMNRA-8540

Input 16

Ronald L. Rindge
160 E. Street
Cayucos, CA 93430

August 2, 2004

Woody Smeck, Superintendent
National Park Service, SMMNRA
401 West Hillcrest Drive
Thousand Oaks, CA 91360-4207

RE: Fire Management Plan

Dear Mr. Smeck:

In reviewing the extensive Draft Fire Management Plan, I now realize that it pertains only to NPS properties in the SMMNRA. My comments which follow are relevant primarily to the L. A. County Fire Department, with whom NPS must necessarily coordinate all fire related issues in the SMMNRA. Accordingly, I request that the copy of this letter and its attachments be sent to the appropriate authority within the L. A County Fire Department who is working closely with you to insure: **1. Public safety and, 2. Firefighter safety and fire repression water resources.**

Public Safety

Most citizens do not realize how fast a wildfire can move and endanger them if they are in the path of the fire and can quickly be trapped. The ever-increasing visitor count in the SMMNRA – on roads, in campgrounds and in parks, and on back-county trail systems – is **the** major public safety concern. Judicious and prudent closing of these areas at times of high fire danger is the primary responsibility of all agencies involved in fire management in the SMMNRA. On November 9, 1972, in an oral presentation at a meeting of the Malibu Historical Society, I expressed the following concerns, which are more serious now than thirty two years ago:

> **Population Density-(partial extract):**
> **The need is great to provide emergency evacuation of and medical care for injured or sick persons, not only during the "off season", but more pressingly during those days when the traffic in the community is at a standstill.** ***Add the threat of a major fire on a peak traffic day and visions of catastrophic loss quickly come to mind.*** **If the danger to the general public is such that even one life is lost because of this congestion, the County and State (and NPS) may be forced to control the ingress to the community by coordinated traffic-count stations set up around the perimeter of the Malibu (SMMNRA) area on those days when just about everyone seems to be trying get into Malibu (SMMNRA).**
> **(Extracted from pages 10 and 11 of 14 pages of talk by RLR, 11-9-1972).**

Enclosed are copies of pgs. 10 & 11 of my 11-9-72 report which include the above quote.

1

Firefighter Safety and Fire Suppression Water Resources:

Water is a fireman's best friend in fighting fires, especially if he has no water resource and a wildfire is threatening to entrap him and other people or cause major property loss. **THERE IS AN AQUIFER HOLDING 10 MILLION GALLONS OF WATER IN THE CENTER OF THE SMMNRA! The fully silted reservoir behind the Rindge Dam in Malibu Canyon contained 574 acre feet of water when constructed in 1924. During the last 80 years, this reservoir has filled up with rock and silt as a result of building Malibu Canyon Road (1940-1952), building of the Ventura Freeway, fires denuding the land in the upper watershed and massive land developments adjacent to Las Virgenes Canyon and Creek. Now, the naked eye sees no water at all on the surface, ONLY ALLUVIAL DEPOSITS HIDING THE 10 MILLION GALLONS OF WATER STARTING A FEW FEET BELOW THE VISIBLE SURFACE.**

Accordingly, I recommend the following actions to tap this aquifer and bring the water to concrete holding tanks where it can be used by firefighters:

1. **Install a high-volume submersible pump and well about 5-10 feet below the top of the aquifer at a point about 30 feet north of the top of the dam.**
2. **Construct piping from the submersible pump to concrete water storage tanks above the dam and out of public view off the west side of Malibu Canyon Road. There is a depression in the landscape there that should serve this purpose very well.**
3. **Establish strict access to this water resource site under the control and direction of the L. A. County Fire Department as the lead agency in this part of the SMMNRA. The public need not have access to this vital, life-saving resource put there for the sole purpose of fire suppression if and when the need arises.**

Pumper units could refill tanks without driving north or south on Malibu Canyon Road to existing fire hydrants. This would save precious time during a fast moving fire and the fuel costs to laboriously move heavy, water-laden tanker trucks up Malibu Canyon Road from PCH to get closer to hot spots in the middle of the SMMNRA.

These thoughts were conveyed to the Army Corps of Engineers in my letter of June 11, 2002 (Addendum No. 2, items 1 & 2) which suggested this alternate use of the Rindge Dam and Reservoir. A copy of this two-page letter is attached with the portions relevant to harnessing 10 million gallons in the middle of the SMMNRA being highlighted. I have had no response from the Army Corps of Engineers or the State Parks Department who have been conducting extensive and costly studies on the Rindge Dam and reservoir for many years. I fear that this suggestion never got to fire officials for further study. It is my opinion these actions would benefit public safety and facilitate fire repression efforts on the part of fire agencies if the will to do so is activated.

2

As for funding, I would hope those controlling the purse strings of government spending would consider this action to improve public safety a higher priority for the human species than the millions being spent on phantom fish in the upper Malibu Canyon watershed. I respectfully request the NPS forward the second copy of this letter and attachments to the appropriate authorative person in the L. A. County Fire Department working with NPS on a coordinated fire management plan for the SMMNRA.

Sincerely,

Ronald L. Rindge

Ronald L. Rindge
Phone and FAX (805)995-3609)

Enclosures: Pages 10 & 11 from Nov. 9, 1972 oral report to Malibu Historical Society.
Two-page letter to Army Corps of Engineers dated June 11, 2002.

P.S. Has it been decided when to close back-country trails or any other parts of the SMMNRA this fire season which appears to be coming earlier than usual because of drought conditions?

less displacement of terrain plus would have the advantage of preserving and opening up many vistas not otherwise available through a freeway network. Detailed studies on these concepts would be necessary, but it seems probable that a high-capacity, more efficient people-moving rail or monorail system would be better than a freeway.

In any event, when the people count pouring into the Malibu area on <u>any</u> system of roads or rails exceeds logical limits, control over entry will have to be established.

5. <u>Population Density</u>: If the above concepts were realized, population density in Malibu for residents and recreational visitors alike would be greater, thus allowing a better utilization of the area in satisfying the needs of [redacted] Southern California, [redacted]. However, short of an integrated land use plan and some interim mass-transit system, it appears Malibu is near saturation levels, not so much because of increasing year-round residents, but because of the overload on the area caused by recreational-minded visitors. The overload is critical as it is strangling the community on weekends and summer months, thus making it imprudent to expand the resident population much more until the needs of both the resident and transient populations have been provided for.

Los Angeles County and State governmental units need to move quickly to solve these problems or it is possible that serious loss to persons and property could occur because of inadequate safety precautions and security services. The need is great to provide emergency evacuation of and medical care for injured or sick persons

R. L. RINDGE, NOV. 9, 1972

June 11, 2002

U. S. Army Corps of Engineers
Los Angeles District
911 Wilshire Boulevard
P. O. Box 532711
Los Angeles, CA 90053

Certified Mail
Return Receipt No.
7000 1530 0004 1837 5945

RE: Addendum No. 2 to record of public input commenced at public hearing of May 29, 2002:
Alternative uses of Rindge Dam and Reservoir.

Attention: Mr. Jason Shea

Dear Mr. Shea:

This letter is added input to my previous letters dated May 25, 2002 and June 7, 2002, relevant to your Feasibility Study on the Rindge Dam. I request your study include, investigate and report on the following alternative uses, other than "No Action", of the Rindge Dam and Reservoir, a multi-million dollar asset of citizens and taxpayers:

Alternative uses of Rindge Dam and Reservoir in order of priority:

1. **Fire repression:** Install a submersible pump in the aquifer behind the dam, which holds more than 10 million gallons of water. Pump the water to a low profile concrete water tank on the west side of Malibu Canyon Road across from the old Sheriff's Honor Camp site. Fire trucks could refill with water at this mid-mountain location, rather than have to laboriously and inefficiently drive out of the mountains to refill at times of wild fires, or when public water service in the Las Virgenes or District 29 systems are inoperative for any reason. The public water supply could be cutoff by earthquakes, landslides, land-slippage, ruptures of mains or cutoff of water from agencies serving District 29. This would provide an alternate source of water for fire repression using the aquifer as the secondary source. This alternate system using additional tanks, mains and hydrants could be expanded to serve areas such as Sweetwater Mesa, Malibu Knolls, Serra Retreat and the entire Malibu delta including Malibu Colony. The L. A. County Fire Department, the City of Malibu, State Parks, the National Park Service and the Army Corps of Engineers and any others who are responsible for public safety in the SMMNRA should evaluate this alternative.

2. **Safety zone:** An additional benefit of Proposal 1 above, would be to create a safety zone for persons stranded or isolated on Malibu Canyon Road at times of fire in the same area as the low profile water tank. A small fireproof blockhouse could also be placed here to serve as a haven during a passing fire. Being on the west side of Malibu Canyon Road and substantially hidden from passing traffic, the beauty of the vistas in the area would not be impaired. Access to this safe zone with water storage would be controlled by L. A. County Fire in cooperation with Sheriff, State Parks and National Park Service personnel. The intent is not to make it a visitor's area, but only as an emergency safety zone if and when needed. Accordingly, it would be opened rarely, only as critical circumstances warranted.

3. **Partial rehabilitation of dam and reservoir:** Remove twenty feet of sediment behind the dam, partially restoring reservoir capacity for flood control. Install "flashboards" at spillway intake leaving a three to five foot opening between the lowest board and the top of the spillway. This would allow a slower release of floodwaters, if and when available reservoir capacity filled up to the brink of the spillway. The excess drainage from the upper watershed would back-up behind the flashboards thereby alleviating the danger of a flash flood. A screening structure or device would be installed around the intake area to divert large debris that might clog the aperture between the spillway and the lowest flashboard. Most flash floods occur in a matter of a few hours. This use would protect the lower watershed from most flash flooding, depending on the severity and duration of a winter storm. Flashboards are not high-tech but they can do the job at low cost. Spillway gates, if considered absolutely necessary, could be installed but at a much higher cost. Geological testing would be important to determine if the removal of twenty feet of sediment would endanger the toe of the slope of Malibu Canyon Road. Current laws relevant to altering wetlands or aquifers would need to be considered. L. A. County Flood Control should be invited to comment on this alternative.

4. **Scenic overlook:** The Rindge Dam and reservoir were important factors in the settlement of the lower watershed. Thousands of such dams were involved in the settlement of America. This dam symbolically represents the last historic expansion of the continental United States ending at the Pacific in the Santa Monica Mountains National Recreation Area. A scenic overlook should be built at the site of the old Sheriff's Honor Camp. Low-to-the-ground interpretive signs would inform the visitor of the history of the area, including: geologic formation; use by the Chumash as their "trail to the sea" (Century Ranch site to Humaliwu); the Sublette/Grizzly Bear encounter in 1853; the dam as related to agriculture and the settlement of Malibu; the Adamson House as a National and State historic landmark; the building of Malibu Canyon Road by the honor prisoners of the L.A. County Sheriff's Department (which opened on July 3, 1952); possibly including the story of the "Pink Lady" of the 1960's and ending with the acquisition of this beautiful canyon by the State of California. This alternative would highlight the cultural significance of the area so close to millions of people in the greater Los Angeles area.

   This concept is consistent with California Assembly Bill AB 1070, which designated Malibu Canyon Road as a State Scenic Highway, effective January 1, 2002. Fran Pavley, Assemblywoman for the 41st District, should be consulted on this matter. This is also consistent with the National Park Service proposal to operate a shuttle bus system for visitors to the SMMNRA. Acting Superintendent of the NPS, Woody Smeck, should also be contacted for the views of the National Park Service on this proposal.

As requested above, please enter these alternatives into the public record for your Feasibility Study on the Rindge Dam.

Sincerely,

Ronald L. Rindge, Taxpayer

cc: Assemblywoman Fran Pavley
Woody Smeck, NPS
Distribution A

Input 17

Ronald L. Rindge
160 E. Street
Cayucos, CA 93430

August 10, 20004

Woody Smeck, Superintendent
National Park Service
401 West Hillcrest Drive
Thousand Oaks, CA 91360-4207

RE: Fire Management in SMMNRA – Water Resources

Dear Mr. Smeck:

Enclosed is an article about two new 420,000-gallon water storage tanks being installed in Templeton, San Luis Obispo County. Each tank is made of welded steel and measures 24-feet high by 50-feet diameter. Also noted that this two-tank project cost $490,000, of which a FEMA grant paid 90%.

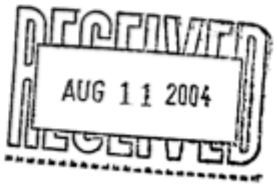
I send this article along to you, Marty O'Toole and others involved in fire management in the event NPS, State Parks, Los Angeles County Fire or Ventura County Fire ever have a water storage project for the SMMNRA to evaluate. The Templeton Community Service District would have very current information on this type of storage tank as well as the funding procedure through FEMA

Sincerely,

Ronald L. Rindge

Ronald L. Rindge

Enclosure: Article, "New water tanks on line", *San Luis Obispo County Tribune,* August 8, 2004, page B-1.



Input 17 continued

TRIBUNE B-1
MAR 8, 2004

TEMPLETON COMMUNITY SERVICES DISTRICT

New water tanks on line

BY ANGELA MANESE-LEE
THE TRIBUNE

The two storage tanks replace a pair damaged in the San Simeon Earthquake and will bring capacity back to 2.7 million gallons

Water began pouring Friday into two 420,000-gallon water storage tanks in Templeton. The new welded tanks replace a pair damaged in the San Simeon Earthquake.

When they are operational next week, the tanks will bring the community's water storage capacity back up to 2.7 million gallons.

Since December, Templeton has made do with 1.86 million gallons stored in two other tanks that sustained only minor earthquake damage, said Bill Van Orden, the Templeton Community Services District general manager. Those two were constructed in the 1990s, after seismic requirements were put into effect.

The damaged tanks were built before those requirements were in place, in 1960 and 1970. When the earthquake hit Templeton, the Lincoln Street neighborhood took the brunt of the damage. Three of Templeton's four tanks sit on College Hill, at the end of Lincoln Street.

"One tank was a bolted tank and, as a result of the shock, the bolts split," Van Orden said. "It had to be taken down immediately because it was leaking in a number of places, and 420,000 gallons of water obviously could do significant damage if it all went at one time."

The second tank sustained irreparable internal damage. Because the tank was not bolted down, the water within it was lifted up with the power of the shock. When it dropped, the force of the water caused the tank to bulge out at the sides, Van Orden explained.

The two 24-foot high, 50-foot diameter replacement tanks are constructed of welded steel and were anchored to a concrete slab to hold them down, said a spokesman for Paso Robles Tank, the firm that built them.

A FEMA grant covered 90 percent of the $450,000 project. The services district paid the remaining 10 percent.

Since December, the district has limited water usage by urging residents to conserve and installing restrictors to construction water meters, Van Orden said.

With the new tanks in place, Van Orden said he did not expect usage to increase.

Input 18

jean public
<jeanpublic@yahoo.com>
06/25/2004 02:47 PM
MST

To: samo_fire@nps.gov
cc: rodney.frelinghuysen@mail.house.gov
Subject: public comment on fed register of 6/16/04 vol 69 no 115 page 33655

us doi nps -

the first alternative is to stop allowing so many HOMES to be built in this fire prone area. make the land free from homes/buildings that can burn up. stop letting builders develop.

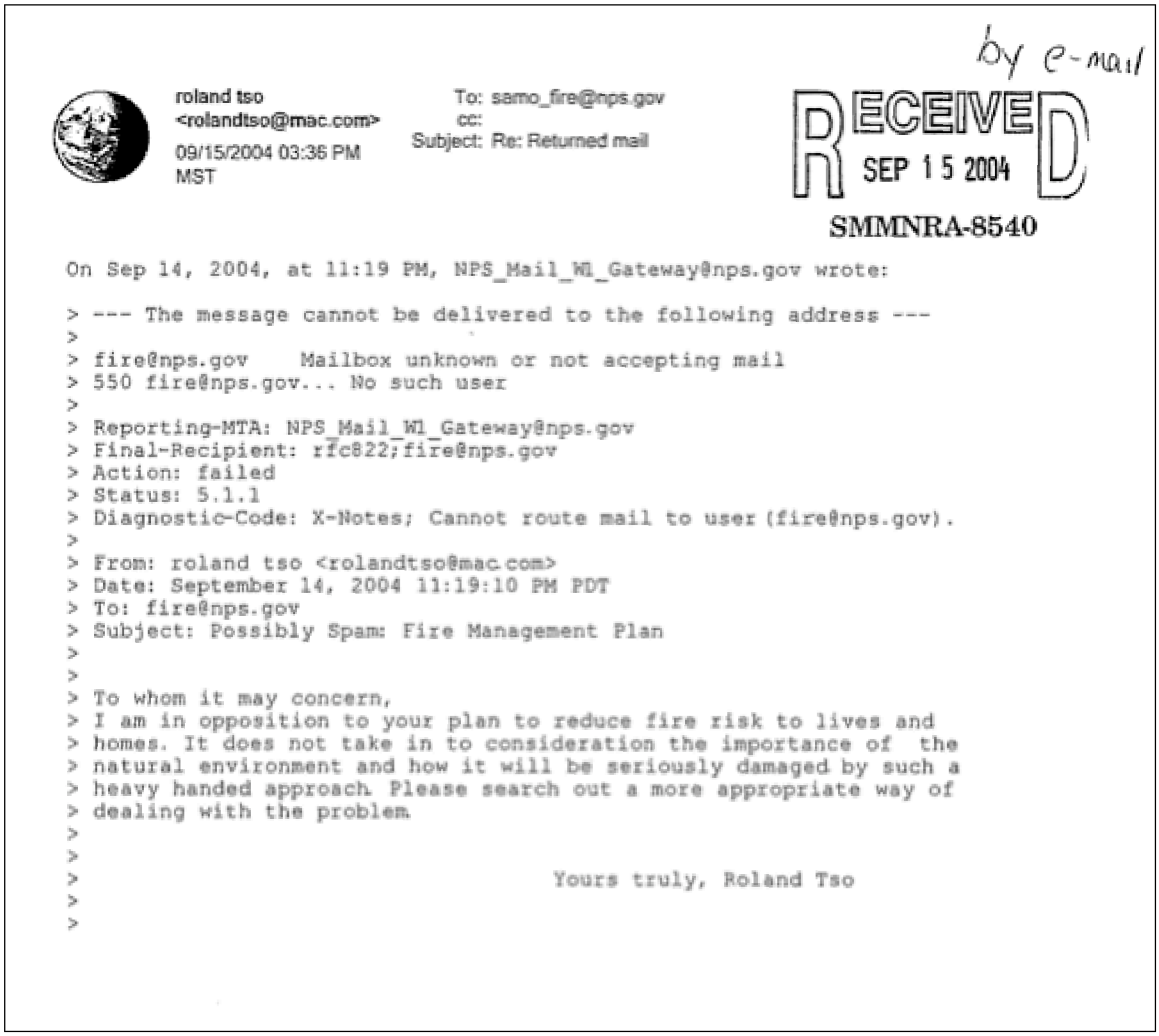
no burning at all should be done with alleged "controls". air particulates poison people, causing genetic malformations, asthma in children, heart attacks and lung cancer. such alleged controlled burning kills people, birds and wildlife.

i thoroughly oppose burning and polluting our air. i want epidemiologists and medical doctors consulted whenever any alleged "controlled" burning is contemplated.

b. sachau
15 elm st
florham park nj 07932

maybe if the park service gets sued for bad health from people in the area they will stop using this unhealthful activity.

Input 19



by e-mail

roland tso
<rolandtso@mac.com>
09/15/2004 03:36 PM
MST

To: samo_fire@nps.gov
cc:
Subject: Re: Returned mail

RECEIVED
SEP 15 2004

SMMNRA-8540

On Sep 14, 2004, at 11:19 PM, NPS_Mail_W1_Gateway@nps.gov wrote:

> --- The message cannot be delivered to the following address ---
>
> fire@nps.gov Mailbox unknown or not accepting mail
> 550 fire@nps.gov... No such user
>
> Reporting-MTA: NPS_Mail_W1_Gateway@nps.gov
> Final-Recipient: rfc822;fire@nps.gov
> Action: failed
> Status: 5.1.1
> Diagnostic-Code: X-Notes; Cannot route mail to user (fire@nps.gov).
>
> From: roland tso <rolandtso@mac.com>
> Date: September 14, 2004 11:19:10 PM PDT
> To: fire@nps.gov
> Subject: Possibly Spam: Fire Management Plan
>
>
> To whom it may concern,
> I am in opposition to your plan to reduce fire risk to lives and
> homes. It does not take in to consideration the importance of the
> natural environment and how it will be seriously damaged by such a
> heavy handed approach. Please search out a more appropriate way of
> dealing with the problem.
>
>
> Yours truly, Roland Tso
>
>

Input 20

It is obvious that within the Santa Monica Mountains National Recreation Area that there are numerous homes and their occupants currently at risk from a catastrophic wildland fire. The risk is due to the proximity of these homes to accumulations of hazardous (flammable) wild land fuels. Many of these homes are adjacent to the federal lands. The families living in these homes rarely have the subject matter background to recognize the risk. The local fire departments do recognize the risk. The executive and legislative branches of the federal government also recognize the risk and fund a fire program for this recreation area. This fire program is directed to mitigate the hazard. All those that are employed to mitigate this hazard and are responsible recognize that reducing hazardous fuels reduces fire intensities. Fire intensities reduced adjacent to these values at risk dramatically improves protection during these reoccurring fires. The anticipated path of these catastrophic fires is accurately anticipated by fire behavior analysts. By appropriate planning and implementation of hazard fuel reductions much can be done to improve protection in the local wildland urban interface. The Biswell Symposium: Fire Issues and Solutions in Urban Interface and Wildland Ecosystems 1994

The preferred alternative (2) contained within this Environmental Impact Statement with its limits and constraints on implementing fuels treatments will do nothing to improve the safety of the home owner and fire fighter. The authors of this EIS are much more concerned with the possibility of natural resource impairment attached to fuel management activities than the well being of the parks neighbors and firefighters. This prioritizing of their perceptions of ecosystem health or appearances is done in spite of the directive given to agency fire management programs to prioritize public and fire fighter safety (NPS Directors Order 18). Homes and their occupants have a higher value than any risk to bushes. Responsible land managers recognize that social values have more importance than any limited (total acres) impact to environmental values. Due to inexperience or bias the authors fail to recognize that any real impairment of resources that might be a result of fuel management practices is easily mitigated by simple restoration in the field and significant large scale impacts are not substantiated by data. Statistically valid data collected over time shows a much more resilient chaparral ecosystem than represented in the text of this document. The authors selected data and embellished on any possible literature to support the perception that fuel management has an unacceptable or negative impact on the environment. To support their bias data showing positive ecosystem responses (habitat enhancement & increased biodiversity) attached to fuels management has been excluded from consideration in this document.

Direction is provided by federal and state policies and legal codes. The local potential and historical precedent for an extremely hazardous fire environment is obvious. In spite of the risk, the preferred analysis of this EIS does nothing to improve protection or assist the interagency suppression community in the challenge of improving safety and reducing loss.

Federal agencies are governed by the National Environmental Protection Act. The purposes of this Act is to declare a national policy which will *encourage productive and enjoyable harmony between man and his environment;* to promote efforts which will prevent or eliminate damage to the environment and biosphere and *stimulate the health and welfare of man*; to use all practicable means and measures, including financial and technical assistance, in a manner calculated to foster and *promote the general welfare, to create and maintain conditions under which man and nature can exist in productive harmony, and fulfill the social, economic*, and other requirements of present and future generations of Americans. Attain the widest range of beneficial uses of the environment *without degradation, risk to health or safety, or other undesirable and unintended consequences; achieve a balance between population and resource use which will permit high standards of living and a wide sharing of life's amenities*. The National Environmental Protection Act recognizes the need to protect the social values. Again responsible people prioritized health and safety. The authors of this EIS seem oblivious to the risk.

Land managers especially in this wildland urban environment have been instructed to use the National Fire Plan & Federal Fire Policy when creating a fire management plan. (Objective II pg 1-5). Important portions of the policy that do not fit the agenda or bias of the authors have been excluded. Significant portions of the policy that have been excluded are "*adopt an operational role in the wildland/urban interface that includes wildland firefighting, hazard fuels reduction, cooperative prevention and education, and technical assistance. Identify and fund, on a cost-share basis, high-priority fuels management activities on Federal lands adjacent to wildland/urban interface areas identified through a fire protection assessment process that considers relative values to be protected. These activities may involve adjacent non-Federal lands*.

This document attempts to deceive the reader by including the goals 1, 2, 4 & 5 outlined on page 1-4. These goals are not met with the preferred alternative. This Park unit receives substantial staffing and funding to implement these goals and expand on the wildland & urban interface fuel reduction program. The positions currently staffed are to be primarily dedicated to the planning, management and monitoring of wildland interface fuel reduction treatments. Using the provided WUII funding on restoration projects while ignoring homes at risk is certainly a misuse. (see Wildland Fire Management Appropriation Fund 85 Budget Structure).

Historically the local fire protection agencies have encouraged and cooperated with this park unit in a broad spectrum of WUII and hazard fuel reduction projects. This agency is directed to establish and maintain collaborative efforts for fuel reductions with these protection agencies. These fire departments cooperate by providing expertise in the planning phase, labor to prepare the treatment area and provide much of the operational requirements for implementing and accomplishing the projects. Cooperative efforts between agencies on fuel reduction treatments with adequate planning would dramatically improve protection to many of the local communities (Westlake, Oak Park,

Input 20 continued

Agoura, Malibu, Topanga, Pacific Palisades and Beverly Hills) adjacent to the recreation area. The preferred alternative ignores the protection needs of these communities.
The analysis used to determine suitable strategic fuel treatments in this document does not adequately consider social values at risk (human safety and property). See figure 3-18 on pg 3-32. The analysis uses the constraints of percent slope and fuels aged 35 years + (This document emphasizes a shorter fire return interval). These constraints exclude a large percentage of the homes at risk. To truly prioritize safety communities at risk and their relationship to hazardous fuels should be used. (20 years +in mixed chaparral and 10 years + in coastal sage) Also position of the values on the slope (fuels down slope from the value to be protected are more at risk) should be used.

An Environmental Analysis is stated as necessary for strategic treatments with the preferred alternative. An EA is required for small treatments in spite of the Categorical Exclusion provided. With the values at risk it is negligence that this CAT EX would not be utilized locally. Key portions of the text are as follows.

Department of the Interior
National Environmental Policy Act
Determination Needed for Fire Management Activities; Categorical
Exclusions; Notice Department of the Interior give notice of revised procedures for implementing the National Environmental Policy Act (NEPA) and Council on Environmental Quality (CEQ) regulations. Department of the Interior Manual 516
DM, Chapter 2, Appendix 1, which describe categorical exclusions, i.e.,categories of actions, which do not individually or cumulatively have a significant effect on the human
environment and therefore normally do not require further analysis in either an environmental assessment or an environmental impact statement. The revision adds two such categories of actions to the agencies' NEPA procedures: (1) Hazardous fuels
reduction activities; and (2) rehabilitation activities for lands and infrastructure impacted by fires or fire suppression. The agency has conducted a review of peer reviewed scientific literature identifying the effects of hazardous fuels reduction activities, which is available at *http://www.fs.fed.us/emc/hf*i. This combination of reviews give the agency confidence that the categorical exclusions are appropriately defined. These two categorical exclusions will facilitate scientifically sound, efficient, and timely planning and decision making for the treatment of hazardous fuels and rehabilitation of areas so as to reduce risks to communities and the environment caused by severe fires

Input 20 continued

The preferred alternative also does not allow for additional establishment of defensible space or mechanical fuel treatments at the interface. This EIS specifies that the 86.2 acres currently treated will not be expanded upon. On pg. 2-15 ‘’ there will be no need to expand the zone of mechanical fuel modification.’’ No home by home assessment has been made or is planned to be made of mechanical treatment needs at numerous sites on table 2-3. The occupants of these neglected homes and those that serve and protect are placed at risk. The decision criterion for strategic fuel modification projects (pg 3-37 to 3-39) attempts to deceive the reader. Figure 3-32 Decision Model for Strategic Fuel Modification Projects. Site specific hazard mitigation is not defined but additional mechanical treatments are not an option. (pg 2-15) Again safety is not prioritized.

Numerous advantages to areas of young, reduced fuels are disregarded. In spite of claims stated within this EIS it is obvious to those in the field that an age mosaic of fuels creates species diversity and increased native populations. A strategy for a fire management plan should be to separate older more flammable accumulations of wild land fuels from urban areas with areas of younger less flammable fuels. This would reduce the intensity of the flame front at the urban interface due to the fact that fuels accumulate with age. This reduced intensity dramatically improves safety. Have the authors ever worked on a fire line? Younger fuels also have a reduced rate of fire spread allowing additional time for the evacuation of residents. This reduced rate of spread allows suppression resources more time to position themselves at homes in advance of the fire. Often times even with defensible space established, adjacent older fuel beds release sufficient radiant or convective energy to endanger homes and people. Other advantages to fuel reductions strategically located are to reduce the flying burning embers that land within urban areas in advance of a flaming front. Fires are most often contained and suppression costs reduced in areas of young and reduced fuels. Air craft and ground based resources such as wild land engines and hand crews (these are available in significant numbers in this area) would be effective in managing the cooler less intense fire backing on the flanks of a wind drive Santa Ana incident. Reduced fuels often reduce the area burned exposing less homes and/or communities to the catastrophic fire.

The preferred alterative in this EIS creates deliberate obstacles to both creating defensible space around individual homes and creating strategic treatment areas that would improve protection for communities. This fire management strategy with its lack of acres treated and disregard for funding provided to treat acres is in effect utilizing fuels as a weapon against urban areas and the families that live there.

During a wildland fire, the suppression resources assigned to the incident react and attempt to protect as the public expects of them. This EIS exhibits a callous disinterest in the well being of the firefighter. The preferred alternative effectively exposes these civil servants that are employed to protect the social values to unnecessary hazards.

I base the above comments on 30 years of employment experience with federal land management agencies. My employment experience was as a wild land firefighter,

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firefighter supervisor, forestry technician (fuels management) and I am currently a prescribed fire technician. In this position I oversee and manage the recreation areas fuel management program. This position primarily creates and maintains the separation between homes and the hazardous fuels. I have extensive experience on the fire line were I observe the fire environment, fire behavior and their relationship to the neighboring homes.

Charlie Whitman 9/13/2004